

4.4.12-1 INTRODUCTION

This chapter evaluates the long-term effects of the Portageville Bridge Project on parks and recreational resources. Specifically, the chapter assesses the potential impacts of the Project on Letchworth State Park and discusses consistency with relevant federal and state policies, programs, and regulations intended to protect parkland from adverse effects. The impacts of construction activities for the Project on Letchworth State Park's recreational features are evaluated in Chapter 4.5, "Construction Impacts." This chapter considers the permanent effects of the Project on the park's recreational features.

4.4.12-2 METHODOLOGY

This chapter was prepared in accordance with a number of different regulations and programs intended to protect parkland, including the following:

- **New York State Heritage Area Program:** New York State's Heritage Area System (formerly known as the Urban Cultural Park System) is intended to preserve and develop areas that have special significance to the state, because they reflect the cultural themes of the state's development and provide educational, inspirational, economic, and recreational benefits. There are 18 heritage areas in the state. The Project site is not identified as a New York State Heritage Area. The closest New York State Heritage Area to the Project site is Rochester's High Falls Heritage Area, a complex of mills, factories, and archaeological sites adjacent to the Genesee River in the City of Rochester. Therefore, this program does not apply to the Project.
- **National Heritage Areas Program:** Congress has designated 49 National Heritage Areas, where the natural, cultural, historic, and scenic resources are considered uniquely representative of the American experience. These areas, including public and private lands, receive funds and assistance through cooperative agreements with the National Park Service. There are three National Heritage Areas in New York State: the Erie Canalway National Heritage Corridor, the Hudson River Valley National Heritage Area, and the Niagara Falls National Heritage Area. Therefore, this program does not apply to the Project.
- **National Registry of Natural Landmarks:** As set forth in 36 CFR Part 62, a National Natural Landmark "is an area designated by the Secretary of the Interior as being of national significance to the United States because it is an outstanding example(s) of major biological and geological features found within the boundaries of the United States or its Territories or on the Outer Continental Shelf." Properties that are designated as National Natural Landmarks may be in public or private ownership. Such designation does not change the ownership of an area and does not dictate activity, but one of the objectives of the NNL program is that owners and federal, state and local government agencies will take the designation into account when making planning or other future land use decisions. There are no listed nationally significant natural areas within, or adjacent to, the Project area and therefore none are discussed in this chapter.

- **Section 4(f):** Section 4(f) of the U.S. Department of Transportation (USDOT) Act of 1966 (now 49 USC § 303) prohibits the Secretary of Transportation from approving any program or project that requires the use of: (1) any publicly owned land in a public park, recreation area, or wildlife and waterfowl refuge of national state, or local significance, or (2) any land from a historic site of national, state, or local significance (collectively, “Section 4(f) resources”), unless there is no feasible and prudent alternative to the use of such land and all possible planning has been undertaken to minimize harm to the 4(f) resource. The Project is subject to review by the U.S. Department of Transportation, Federal Highway Administration, and therefore Section 4(f) applies to the Project. A Section 4(f) Evaluation is provided in Chapter 5 of this DEIS.
- **Section 6(f):** Section 6(f) of the Land and Water Conservation Fund (LWCF) Act of 1965 (now 16 USC § 460i-4) requires that any property acquired and/or developed with LWCF funds remain forever available for public outdoor recreation use or be replaced by lands of equal market value and recreational usefulness. The U.S. Department of the Interior (DOI), through the National Park Service (NPS), provides funding under the LWCF program for state and local efforts to plan, acquire, or develop land to advance outdoor recreational activities. The New York State Office of Parks, Recreation and Historic Preservation (OPRHP) serves as the New York State agency that administers LWCF funds received from DOI. Using LWCF funds creates certain limitations on future changes to LWCF-funded projects. Once LWCF funds are used for a particular recreation project, that recreational facility cannot be converted to non-recreational use, either wholly or partly (either permanently or on a temporary basis for greater than six months) without approval from NPS in accordance with the requirements of Section 6(f). Letchworth State Park has received funding under the LWCF program, and the Project requires conversion of a small area of parkland to non-recreational use. A Section 6(f) evaluation of the Project has been conducted and is discussed in Chapter 6 of this DEIS.
- **Section 1010:** The Urban Park and Recreation Recovery Act (UPARRA) of 1978 (16 USC § 2501) was created by Congress to “assist physically and economically distressed urban jurisdictions to revitalize their recreation systems, and to enhance overall recreation opportunities through the use of existing and potential recreation resources.” Under UPARRA, conversion of existing parkland that has received UPARRA funding to a non-park use can be granted by DOI through the National Park Service only if alternatives have been evaluated and steps are taken to identify, evaluate, and supply replacement parkland. Letchworth State Park has not received funds under the Urban Park and Recreation Recovery Act. Therefore, the Portageville Bridge Project does not involve the use of land from a park to which Urban Park and Recreation Recovery Program Act funds have been applied and no further evaluation of this program is required.
- **Parkland Alienation Principles:** Parkland “alienation” occurs when a municipality wishes to discontinue or convey municipal parkland. This conveyance is done in the form of a “parkland alienation” bill granted by the New York State Legislature and approved by the Governor. The Parkland municipal alienation principles do not apply to this project since Letchworth State Park is under the jurisdiction of OPRHP and the acquisition and management of these lands are governed by OPRHP Law §§3.09(1), 3.17, 3.19 and 13.06, and since a municipality is not seeking to discontinue use of parkland or convey it for the Project.

4.4.12-3 EXISTING CONDITIONS

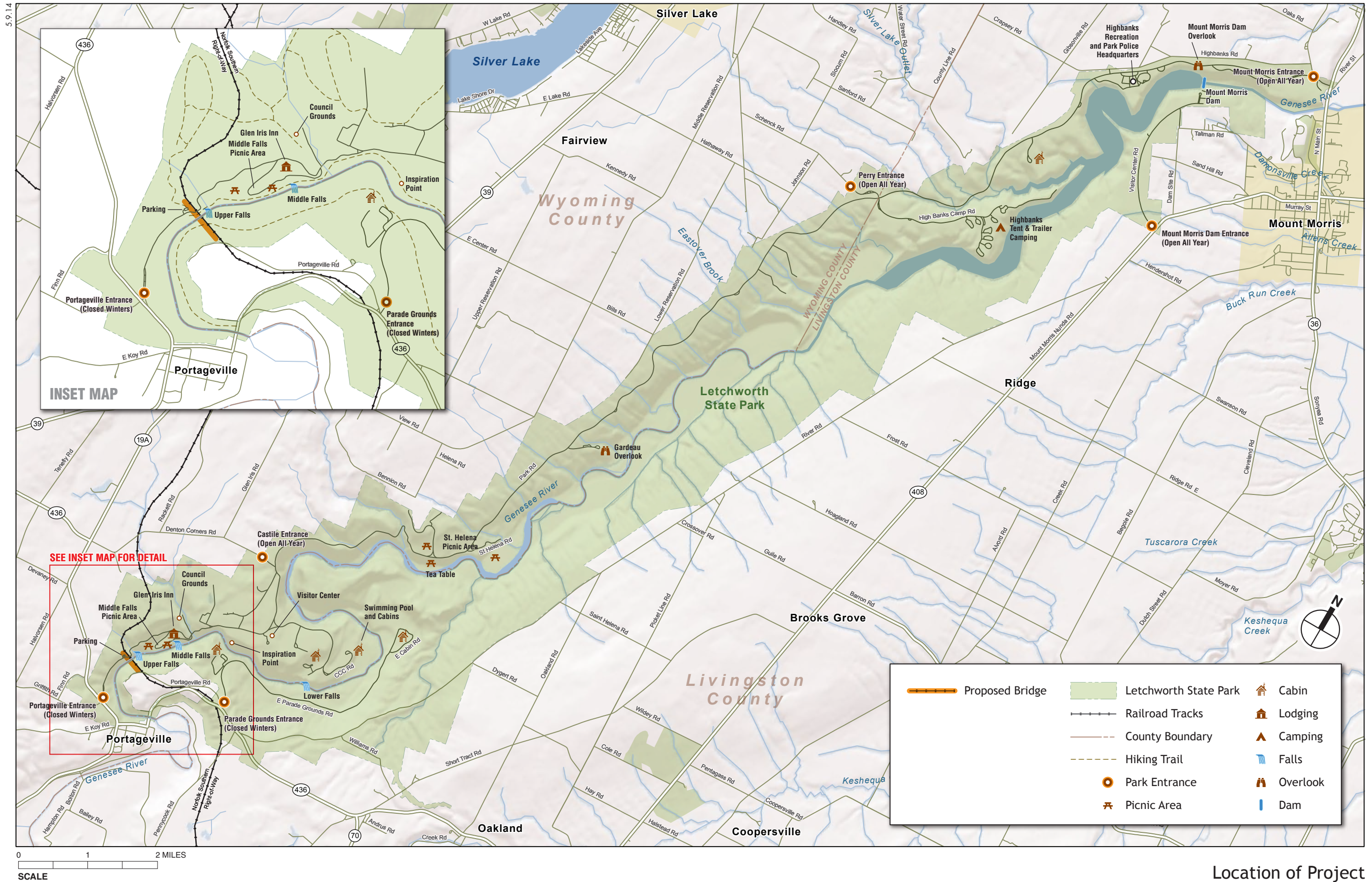
4.4.12-3-1 Letchworth State Park Overview

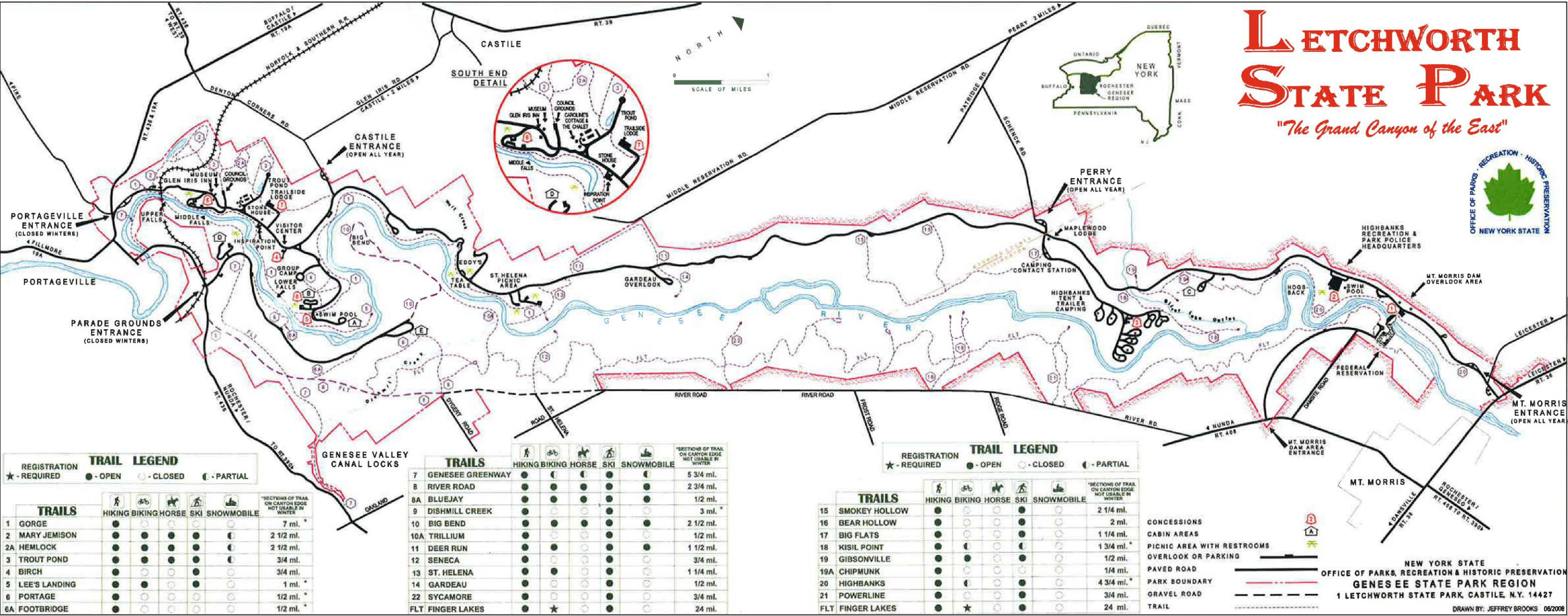
The Project site is located at the southern end of Letchworth State Park, a 14,345-acre park that extends approximately 17 miles along the Genesee River in New York's Wyoming and Livingston Counties. The park is generally wooded with winding roads and hilly terrain. Within the park, the Genesee River flows northward toward Rochester and Lake Ontario through a deep gorge and over three major waterfalls that are in the southern section of the park: Upper Falls, Middle Falls, and Lower Falls.

As a state park that is listed on the State and National Registers of Historic Places, Letchworth State Park is an aesthetic resource of statewide significance. The Genesee River and gorge, waterfalls, and the Portageville Bridge are contributing elements of this aesthetic resource. The park's scenic features include the forested gorge, waterfalls, and river; vistas and overlooks, including views of the Portageville Bridge; as well as the historic built features in the park—the railroad bridge, the picturesque stone walls and staircases along the park's roads and trails, stone structures (comfort stations, concession stands, picnic tables, etc.), and a number of historic structures such as the Glen Iris Inn and Council Grounds, where historic cabins have been reconstructed. In recognition of the gorge's scenic qualities, the portion of the Genesee River within Letchworth State Park has been protected by special federal legislation, the Genesee River Protection Act of 1989. This legislation gives the river unique status as a permanent Study River under the National Wild and Scenic Rivers Act of 1968 (see Chapter 4.4.3). The Nationwide Rivers Inventory lists this segment of the Genesee River for its three "outstandingly remarkable values": geologic value related to the river's three major waterfalls; recreational value in a six-mile stretch downstream of Lower Falls; and scenic value. **Figure 4.4.12-1** shows the location of the Project site in relation to the park, and **Figure 4.4.12-2** provides the official park map available from the OPRHP.

Letchworth State Park originated as the estate of William Letchworth, who began purchasing property near the three waterfalls in 1859. This included the house that is now the Glen Iris Inn, as well as surrounding lands. Letchworth continued to purchase and improve the land around his original property until 1907, when he deeded his 1,000-acre estate to New York State and to the stewardship of the American Scenic and Historic Preservation Society (ASHPS) in order to protect the land from future development. The ASHPS ceded the land to the State of New York as part of the state's new park system in the 1930s. During the 1920s and 1930s, the park was expanded through the acquisition of land toward the north and along the east side of the Genesee River and by 1952, most of the land that makes up today's Letchworth State Park had been purchased or given to the State of New York. The ASHPS made changes to facilitate automobile access, including construction of comfort stations, new parking areas, and expansion of the road system. During the Great Depression, the Civilian Conservation Corps, instituted by President Roosevelt in 1933, also made numerous improvements to the park. Today, Letchworth State Park is under the jurisdiction of the OPRHP.

According to OPRHP, Letchworth State Park is used by approximately 650,000 annual visitors and hosts a variety of recreational features and activities, all organized along and around the scenic Genesee River and gorge. These include scenic roads and 66 miles of trails that can be used for hiking, biking, horseback riding, snowmobiling, and cross-country skiing. There are over 270 campsites, 82 cabins, numerous picnic areas, two swimming pools, and the historic Glen Iris Inn, the former home of William Letchworth. Hunting and fishing are allowed, as well as whitewater rafting, kayaking, and hot air ballooning. The park has a number of scenic viewing locations, including the scenic overlooks that are located along the edge of the Genesee River gorge, connected to the park trail system.





The main park road, known as Park Road, runs along the western side of the river with turnoffs leading to viewpoints and other park areas. On the eastern side of the river, park roads provide access to the south and north ends of the park, but there is no continuous park road along this side of the river. A number of trails also run along both sides of the river for the length of the park. One pedestrian crossing is available across the Genesee River, via the Footbridge Trail, which crosses the river on a scenic stone bridge just downstream of the Lower Falls, connecting the Gorge Trail to the park road on the east side of the southern end of the park (East Park Road).

The south end of the park is notable for the river gorge and three waterfalls, the scenic overlooks, and a concentration of the park's historic structures and sites. According to OPRHP, this is the most intensely used area of the park and supports the greatest number of visitors. The Portageville Bridge (discussed below) contributes to the scenic character of this end of the park and is depicted on park postcards and memorabilia. The north end of the park has fewer scenic sites of this nature, and is characterized predominantly by the Mt. Morris Dam on the Genesee River. This end of the park also has a large trailer and tent camping area.

4.4.12-3-2 South End of Park near Rail Bridge

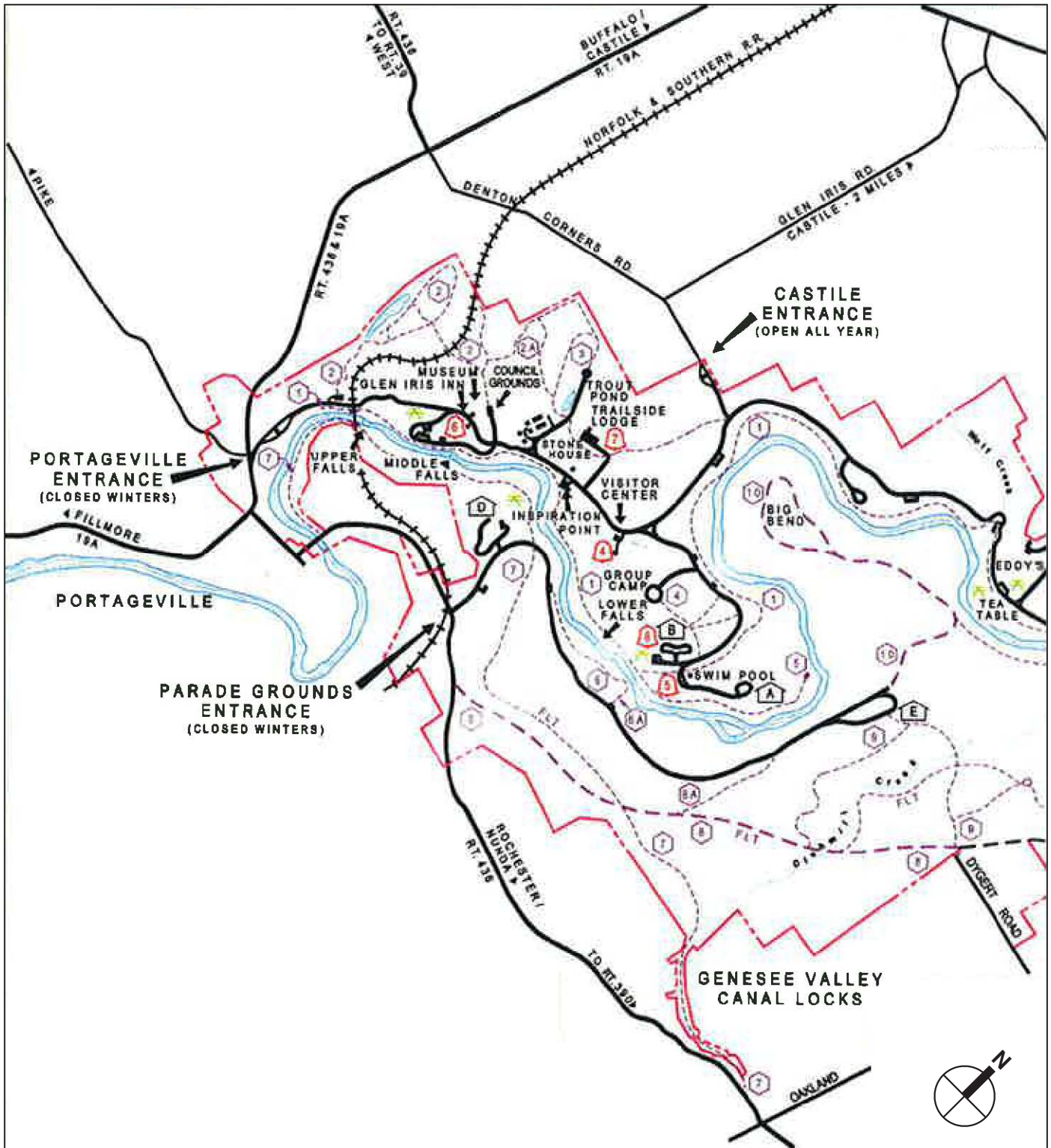
As shown in **Figures 4.4.12-1 and 4.4.12-3**, the south end of Letchworth State Park includes a number of park features, including historic sites, trails, and scenic points. On the west side of the river, many of the park's historic sites are clustered in the southern end of the park. Park features in the south end of the park near the Portageville Bridge include (but are not limited to) the following features:

- *Genesee River Gorge and Waterfalls.* The Genesee River gorge forms the spine of the park, with park features arranged around the river. In the southern end of the park, the river has three major waterfalls: Upper Falls, located almost beneath the Portageville Bridge; Middle Falls, about ½ mile downstream (to the north); and Lower Falls, about 1¼ mile farther downstream from Middle Falls.
- *Park Road and Park Entrances.* Park Road runs north–south along the west side of the Genesee River gorge, for the length of Letchworth State Park, providing access to recreational features throughout the park.

Park Road has four public entrances. In the south end of the park, Park Road begins at the Portageville Entrance on Route 19A. The Portageville Entrance is a rustic-style entrance structure with two lanes for entering traffic and two lanes for exiting traffic. The Castile Entrance from Denton Corners Road is a more utilitarian style wooden booth with one entering lane and one exiting lane. Farther north, Park Road is also accessible via the Perry Entrance and Mt. Morris Entrance.

During the winter, most of Park Road is closed and remains unplowed, which allows its use for winter recreational activities. During winter months, the Portageville Entrance is closed. The other three park entrances are open year-round, but provide access only to short segments of Park Road during winter months, when the rest of the road is closed. In the winter, Park Road is open between the Mt. Morris Entrance and Perry Entrance, and from the Castile Entrance to Glen Iris Inn and other recreational features near the Middle Falls. South of Middle Falls, including in the area alongside the Portageville Bridge, Park Road is closed in the winter and serves as part of a designated snowmobile trail.

- *Highbridge Parking Area.* This small parking area is located on the west side of Park Road just south of the Portageville Bridge. It currently serves park visitors using the southern trailheads for the Mary Jemison Trail and Gorge Trail (discussed below) and is part of a snowmobile trail in the winter.



NOTE: For Trail Legend See Figure 4.4.12-2

NOT TO SCALE

OPRHP Map of South End of
Letchworth State Park
Figure 4.4.12-3

- **Trails.** As shown in **Figure 4.4.12-2**, 28 interconnected trails, totaling some 73 miles, run through the park. All of these trails can be used for hiking, and a number can be used for biking, horseback riding, skiing, and snowmobiling. As noted on **Figure 4.4.12-2**, sections of these trails along the canyon edge cannot be used in the winter. Three trails are close to the Portageville Bridge:
 - *Mary Jemison Trail.* This trail, designated as Trail #2 on OPRHP's park map, is a 2.5-mile trail that runs from the Highbridge Parking Area to the Council Grounds site. This trail is used for hiking, biking, horseback riding, skiing and snowmobiling, in the winter and archery hunting in the fall as part of the deer management program in the park. For snowmobilers, the Mary Jemison Trail provides a connection from the south (via the Park Road beginning at the Portageville Entrance) to a larger corridor trail (State Corridor Trail 3) to the north. In addition, OPRHP sometimes uses the southern end of the Mary Jemison trail for interpretive programs.
 - *Gorge Trail.* The Gorge Trail designated as Trail #1 on OPRHP's park map, extends seven miles along the western edge of the Genesee River gorge from a trailhead near the base of the existing rail bridge to the St. Helena Picnic Area in the middle of the park. Access to this trail is available from a number of points throughout the park. Near the Portageville Bridge, the Gorge Trail begins just south of the bridge across Park Road from the Highbridge Parking Area, and passes beneath the bridge as it heads north along the edge of the gorge. The edge of the trail is lined with a rustic stone wall and just north of the rail bridge, the trail descends on a picturesque stone staircase.
 - *Genesee Valley Greenway Trail.* On the east side of the river, the Genesee Valley Greenway Trail, designated as Trail #7 on OPRHP's park map, currently runs 5.75 miles within Letchworth State Park using the abandoned railroad bed of the Pennsylvania Railroad, which had originally been developed as the Genesee Valley Canal. The segment of the Genesee Valley Greenway Trail in Letchworth State Park is part of a longer trail being developed on the canal tow path and rail bed that will extend 90 miles between Rochester and Cuba (at I-86 in the Southern Tier). Most of the Genesee Valley Greenway Trail between Rochester and the hamlet of Portageville, including the segment in Letchworth State Park, is now open. In the park, the trail runs close to the east side of the river and passes beneath the Portageville Bridge. However, there is a break in the trail in the park across from Inspiration Point as a result of a slide/slope failure. The detour around this slide area takes trail users out of the park and avoids the portion of the trail that runs along the river gorge beside the Upper and Middle Falls and beneath the Portageville Bridge.

The segment of the Genesee Valley Greenway Trail in the park is also part of the Finger Lakes Trail, which extends 26 miles from Mt. Morris at the northern end of the trail to the hamlet of Portageville at the southern end and connects there with the main Finger Lakes Trail system that runs east and west across upstate New York. Outside of the park, other sections of the trail are in the planning or construction stages.¹
- **Upper and Middle Falls Picnic Area.** On the west side of the river between the Upper and Middle Falls, a picnic area is located along the west bank of the river, close to the level of the water. It has a large paved parking area, lawns with trees and stone picnic tables, a concession stand, and a comfort station. The Gorge Trail runs along the edge of the picnic area close to the river's edge. At the south end of the picnic area, a path leads to a vista point of the Upper Falls and Portageville Bridge.

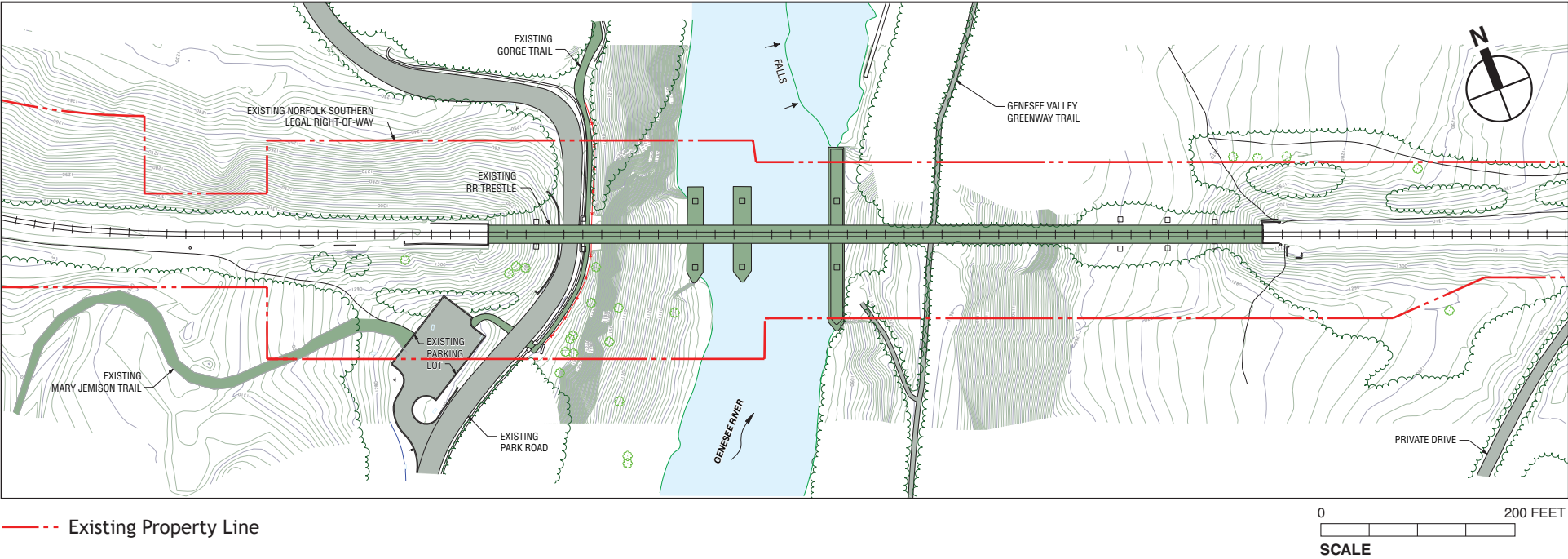
¹ <http://www.fogvg.org>, accessed March 2012.

- *Glen Iris Inn and Other Accommodations.* The historic Glen Iris Inn is west of and uphill from the Upper and Middle Falls Picnic Area. This mid-19th century structure was originally the home of William Pryor Letchworth and now is a destination in the park that provides lodging and meals. The Glen Iris Inn has a large, grassy lawn lined with trees and a stone terrace overlooking the Genesee River gorge above the Middle Falls. Near the inn, the Pinewood Lodge and three other rental houses also provide accommodations. The inn and lodge are closed during the winter (November through Good Friday).
- *William Pryor Letchworth Museum.* Behind the inn, the William Pryor Letchworth Museum is a museum specializing in the history of the Genesee River Valley. The museum is closed during the winter (November through April).
- *Council Grounds.* West of Park Road and the inn and museum, the Council Grounds site features a Seneca Council House relocated to the site by William Pryor Letchworth, and the burial place of Mary Jemison, an early settler in the area who was captured by and then lived among the Seneca.
- *Inspiration Point.* Continuing north along Park Road from the Glen Iris Inn and Council Grounds, a number of scenic vistas are available. The widest vista is from the park's Inspiration Point, approximately 1½ miles north of the Portageville Bridge. From this location, the bridge is visible as a small element crossing through the tree canopy above the river gorge.
- *Scenic Vistas.* The park provides a number of scenic overlooks of the gorge and each of the waterfalls. As described in Chapter 4.4.13, "Visual Resources," the bridge is a scenic feature in views from a number of those locations.
- *Camping and Cabins.* Letchworth State Park includes a number of different overnight accommodations. In addition to the Glen Iris Inn and the nearby accommodations discussed above, these include campgrounds and cabins. The closest camping areas and cabins to the Portageville Bridge are approximately 1 mile away near Inspiration Point.
- *East Side of River.* The east side of the Genesee River in Letchworth State Park has few developed park features in comparison to the west side. Close to Portageville Bridge, the only developed features are the Genesee Valley Greenway Trail (discussed above) and a cabin area near Inspiration Point. This cabin area is closed during the winter. The cabins are accessible by East Park Road, which runs from the Parade Grounds Entrance off Route 436 (which is also closed during the winter) to the cabin area.

4.4.12-3-3 Project Area

As shown in **Figure 4.4.12-1**, Norfolk Southern's Southern Tier rail freight route passes through the southern end of Letchworth State Park. This route is owned by Norfolk Southern and surrounded by the parkland of Letchworth State Park. Norfolk Southern currently operates 12 to 14 trains per day on this route. Norfolk Southern's right-of-way includes the existing Portageville Bridge over the Genesee River, near the Upper Falls in the southern end of the park (see **Figure 4.4.12-4**). The railroad right-of-way, including a rail bridge across the Genesee River, has been in the area that is now Letchworth State Park since the early 1850s, well before Letchworth began to purchase the land that later became the park. As discussed in Chapter 4.4.11, "Historic and Cultural Resources," the original rail bridge was a wooden high bridge. After a fire destroyed the wooden bridge in 1875, the existing iron bridge was constructed in the same location.

The area that would be affected by the Project (discussed below) includes the rail bridge and right-of-way to its east and west. The rail right-of-way and bridge are privately owned in fee by the Norfolk Southern Railway Company and are not parkland. The bridge is currently posted with



Existing Norfolk Southern Right-of-Way
at Genesee River Crossing
Figure 4.4.12-4

“No Trespassing” signs notifying pedestrians that trespassing on the single-track high bridge is prohibited. However, despite these signs and the obvious hazards, pedestrians trespass on the bridge to gain access to the high vista point it provides over the gorge. As discussed in Chapter 2, “Project Context,” the trespassing is a serious safety consideration for Norfolk Southern operations and requires train operators to cross the bridge at very slow speeds.

On the west side of the river, several park features encroach within Norfolk Southern’s existing right-of-way, including an approximately 260-foot-long segment of Park Road (including the portion that passes beneath the bridge), the southern ends of the Mary Jemison Trail and Gorge Trail (including the portion of the Gorge Trail that passes beneath the bridge), and half of the Highbridge Parking Area that provides access to those two trailheads (see **Figure 4.4.12-4**). On the east side of the river, a portion of the Genesee Valley Greenway Trail encroaches within Norfolk Southern’s right-of way (including the segment that passes beneath the bridge).

The Project would also affect a small area of land that is currently parkland but would be acquired by Norfolk Southern to implement the Project. This area includes the other half of the Highbridge Parking Area, an additional segment of Park Road, and additional segments of the Mary Jemison Trail.

4.4.12-4 EFFECTS ASSESSMENT

4.4.12-4-1 No Action Alternative

With the No Action Alternative, there would be no change to parks and recreational resources compared to existing conditions. The existing bridge would remain; no changes would occur to Park Road or the park trails near the bridge; and the existing Highbridge Parking Area that provides access to the Gorge Trail would be unaffected. However, it is likely that park visitors would continue to trespass on the Portageville Bridge, presenting serious safety concerns.

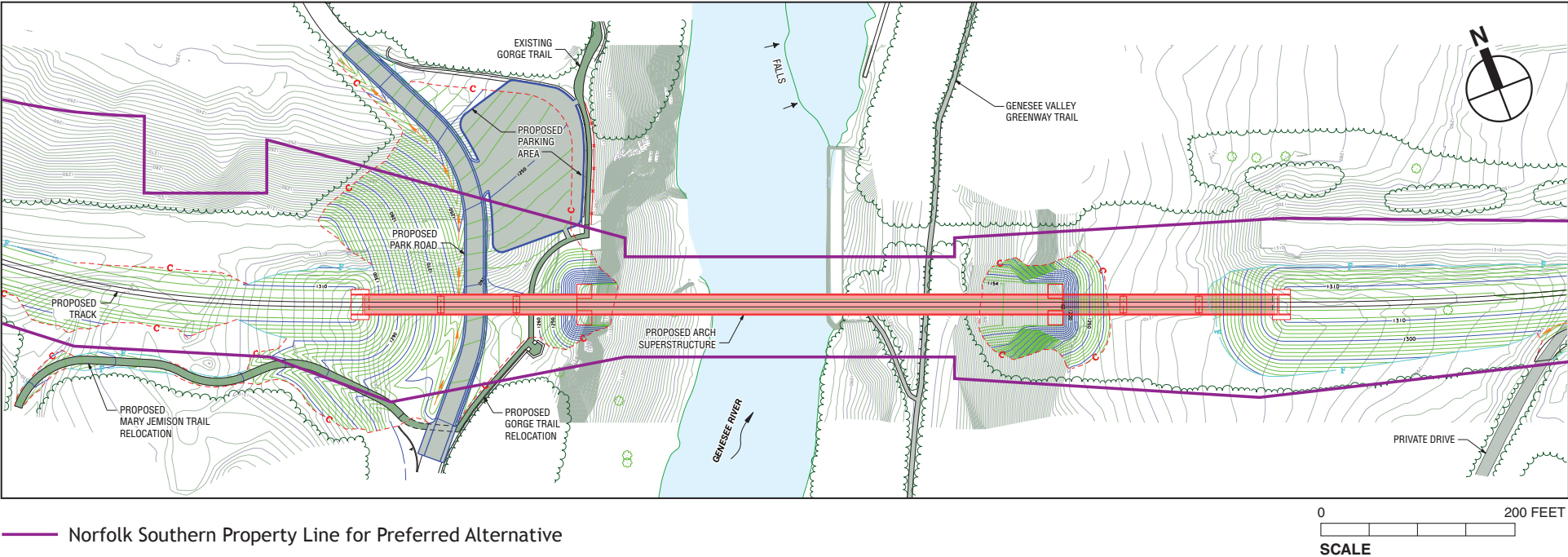
4.4.12-4-2 Preferred Alternative

As described in Chapter 3, “Project Alternatives,” the Preferred Alternative would involve construction of a new bridge parallel, but approximately 75 feet to the south of, the existing bridge and removal of the existing bridge. This would involve shifting the railroad right-of-way southward on either side of the bridge to align with the new bridge. In addition, Park Road within the vicinity of the bridge would be shifted westward to make space for the new bridge structure’s foundations in the gorge wall. The Preferred Alternative would also require relocation of the Highbridge Parking Area from an area south of the existing bridge within Norfolk Southern’s right-of-way to parkland north of the right-of-way.

To accommodate the required shift in the rail alignment, some parkland would have to be acquired for the Project; to compensate for this loss of parkland, Norfolk Southern would convey to the park an equivalent amount of land it currently owns. Norfolk Southern would permanently acquire approximately 1.95 acres of parkland to be used for the new right-of-way and to provide sufficient area around the bridge for construction, access, and security. The use of this parkland for non-park use represents an adverse impact to the park. Most of this area is wooded land or land in close proximity to the current right-of-way that is not generally accessible to the public or in active use for recreational or park purposes, so its conversion to transportation use would not adversely affect the recreational features of Letchworth State Park. To compensate for this loss of parkland, Norfolk Southern would provide land to the park along the existing bridge approaches to create replacement parkland. NYSDOT would assign the state’s preferential right to acquire railroad right-of-way that is no longer used for transportation purposes to OPRHP and Norfolk Southern would subsequently transfer land to OPRHP to become part of Letchworth State Park.

On the west side of the river, the Project would alter the park features that encroach within Norfolk Southern's right-of-way (and also fall within the small area of land to be acquired). As described earlier, on the west side of the river this includes an approximately 260-foot-long segment of Park Road (including the portion that passes beneath the bridge), the southern ends of the Mary Jemison Trail and Gorge Trail (including the portion of the Gorge Trail that passes beneath the bridge), and half of the Highbridge Parking Area that provides access to those two trailheads. On the east side of the river, no changes would occur to any park features. The specific effects of the Project on park features in the southern part of the park when the Project is complete would be as follows (for impacts during construction, see Chapter 4.5 of this DEIS, "Construction Effects"):

- *Genesee River Gorge and Waterfalls.* The Genesee River gorge and the three major falls in the south end of the park would remain essentially unchanged. The existing railroad bridge, including its piers within the river, would be removed, which would allow open views to the south through the gorge.
- *Park Road and Park Entrances.* The alignment of Park Road near the bridge would be shifted slightly to the west to accommodate the new bridge foundations in the gorge wall. With this change, Park Road would continue to pass beneath the Norfolk Southern rail bridge and would continue to run north-south for the length of Letchworth State Park along the west side of the Genesee River. As a benefit of the roadway relocation, an area of Park Road that is currently prone to erosion would be reconstructed to address this issue, and a sharp curve would be removed, resulting in improved sight distances and safety benefits for motorists. In addition, as part of the Project, the Castile Entrance at Denton Corners Road would be upgraded with a larger, two-lane entrance booth to mitigate for the Project's effects during construction on park access (for more information on this upgrade, see Chapter 4.5, "Construction Effects").
- *Highbridge Parking Area.* Approximately half of the Highbridge Parking Area is within property owned by Norfolk Southern, and the other half is on property to be acquired by Norfolk Southern for the Project. To avoid conflicts with the new rail alignment, this parking lot would be relocated to a new site north of the right-of-way, where a larger replacement parking lot would be created as a benefit to park users (see **Figure 4.4.12-5**). The parking lot would be increased from 17 spaces to 34 spaces, with the new parking area including a grassy island to manage stormwater runoff, improve traffic flow, and minimize overall impervious surfaces. The relocated parking lot would continue to serve park visitors using the Mary Jemison and Gorge Trails, as it does today.
- *Trails.* All park trails would remain. The specific effects on the three trails that are close to the Portageville Bridge would be as follows:
 - *Mary Jemison Trail.* The southern trailhead for the Mary Jemison Trail would be shifted slightly to the south, and would be accessible from the west side of Park Road. With this shift, the trail would retain its existing functionality and recreational usefulness.
 - *Gorge Trail.* The southern trailhead for the Gorge Trail would be shifted slightly to the south and west, to meet the relocated Park Road. The trail would pass beneath the new rail bridge and then return to its original route. In the area where the Gorge Trail must be relocated, Norfolk Southern would reuse as feasible portions of salvaged stone to rebuild stone walls along the trail, using a design similar to the existing historic stone walls. In addition, as discussed in Chapter 4.4.11, "Historic and Cultural Resources," as part of the Project, Norfolk Southern would provide funding to be used by OPRHP for its restoration of the existing Gorge Trail between the construction zone and Middle Falls. This work to be directed by OPRHP would include repointing selected walls, replacing and repairing certain damaged stairs, and replacing selected timber railings.



- *Genesee Valley Greenway Trail*. This trail would continue to pass beneath the rail bridge on the eastern side of the river. No changes to the location of the trail would occur.
- *Other Park Features*. The Project would not change the recreational amenities or overall park experience at other locations in Letchworth State Park, including the Middle and Upper Falls Picnic Area, Glen Iris Inn and other accommodations, William Pryor Letchworth Museum, Council Grounds, Inspiration Point and other scenic vistas, and camping and cabin areas. As discussed in Chapter 4.4.11, “Historic and Cultural Resources,” as part of the Project, Norfolk Southern would provide funding to be used by OPRHP for its creation of interpretive materials describing the history of the existing bridge, including outdoor kiosks and an exhibit at the William Pryor Letchworth Museum.

As discussed in Chapter 4.4.13, “Visual Resources,” removal of the Portageville Bridge would result in an adverse effect in terms of visual resources in the park. The bridge currently contributes to the scenic qualities of the park and is an iconic feature on park memorabilia. The new bridge structure, however, would not interfere with or reduce the public’s enjoyment of the natural features that compose Letchworth State Park, and the removal of the current bridge would enhance views of the natural features of the river and gorge because the existing bridge supports within the river gorge would be removed.

The Project would require that approximately three forest acres be cleared, to accommodate the new rail alignment and relocated Park Road and parking lot. In areas disturbed by construction and along the former rail right-of-way, new trees and native species would be planted, limiting the disturbance resulting from tree clearing in that area.

The Project would improve safety conditions for pedestrians in Letchworth State Park by implementing measures to further discourage pedestrians from trespassing on the new rail bridge.

Once the new bridge is in place, freight trains would operate at higher speeds through the park (35 miles per hour rather than 10 miles per hour). This would result in slightly increased noise levels associated with train operations that would be audible in the immediate vicinity of the railroad right-of-way in the park. The area affected would be only a small portion of the park that is immediately adjacent to the proposed new bridge. Consequently, this noise increase would be considered a moderate impact.

Overall, the Project would result in minor changes to park features in the area within the immediate vicinity of the Project site. The small shifts in these park features would not affect their recreational function or adversely affect park visitors’ experience when using these features. Given the small area affected relative to the total acreage of the 14,350-acre park and the minor changes that are proposed, this change would not affect the overall character or features of the park.

4.4.12-5 SUMMARY OF MITIGATION

As discussed in Chapter 3, “Project Alternatives,” a range of different alternatives was evaluated to repair or replace Norfolk Southern’s Genesee River crossing on the Southern Tier route. Several of the alternatives analyzed would remove the freight rail route from Letchworth State Park and therefore would avoid any need to acquire parkland or to remove the existing Portageville Bridge (assuming that a new entity could be identified to take ownership and responsibility for the bridge). However, these alternatives would not meet the Project’s purpose and need and/or were not reasonable and were therefore eliminated from further consideration.

Only one alternative was identified in the screening process that met the Project’s purpose and need and did not present concerns that made it unreasonable, the Preferred Alternative. The Preferred Alternative has been developed and designed to minimize to the greatest extent

practicable the need to acquire parkland. The new bridge would be in the immediate vicinity of the existing bridge, where the rail right-of-way is already located, thereby minimizing the use of parkland for railroad right-of-way.

Minor shifts to two park trails, a parking area, and Park Road would be required, but these shifts would not be adverse and they have also been designed to minimize impacts to the extent practicable. The small shifts in these park features would not affect their recreational function or adversely affect park visitors' experience when using these features. Moreover, several park benefits would be gained through this process:

- Removal of existing bridge piers from the Genesee River.
- Reconstruction of Park Road to address ongoing erosion that has occurred near the railroad bridge and poor sight distances.
- Increase in size of Highbridge Parking Area and improved design to manage stormwater.
- Contribution of funds for OPRHP's restoration of Gorge Trail.
- Re-creation of historic stone walls in the area of Gorge Trail that must be relocated.
- Improvements to the Castile Entrance to the park to upgrade the entrance booth there and increase vehicular capacity.

Approximately 1.95 acres of parkland would be permanently removed from Letchworth State Park and converted to railroad use for the Project. Norfolk Southern will transfer to OPRHP an equivalent amount of railroad right-of-way located in close proximity to the converted parkland to become part of Letchworth State Park, subject to the concurrence of the OPRHP and the approval by the NPS in accordance with the requirements of Section 6(f), as discussed in Chapter 6, "Section 6(f) Evaluation." Therefore, there would be no change in the amount of parkland with the Project. To mitigate for loss of trees in the new right-of-way, the former right-of-way converted to parkland will be revegetated through a tree planting program. Other areas disturbed during construction will also be replanted with native vegetation.

During Project planning and continuing into final design and construction, Norfolk Southern will continue to coordinate with OPRHP and NPS, as appropriate, regarding impacts to Letchworth State Park and design features to minimize those impacts. More information on agency coordination is provided in Chapter 4.1, "Process, Agency Coordination, and Public Participation."